

Pacific Fishermen, Inc.
5351 24th Avenue Northwest
Seattle, WA 98107-4196
National Pollutant Discharge Elimination System
Permit No. WA-003104-6
SECOND ADDENDUM TO FACT SHEET

This is the second addendum to the fact sheet accompanying NPDES Permit No. WA-003104-6, issued to Pacific Fishermen, Inc., June 27, 2003. The following modification is being made as a result of progress made by Pacific Fishermen to implement a new stormwater treatment technology.

PROPOSED MODIFICATION FOR THE PERMIT

The Department is proposing to modify NPDES Permit No. WA-003104-6 as follows:

Final Stormwater Effluent Limitations.

The date for meeting surface water standards as limitations will be changed to September 15, 2007. This is to allow Pacific Fishermen time to conduct a receiving water study, a mixing zone study plan, and to finalize testing on an innovative treatment technology that has the potential to advance stormwater treatment from shipyards. Initial results from the experimental electro-coagulation treatment are within the range of meeting water quality standards. Also, on page eight under compliance schedule to meet water quality standards, the date for completed construction will be changed to September 15, 2007. The following requirements shall be added to the permit:

1. The compliance schedule for the completion of the stormwater treatment system has been extended to September 15, 2007.
2. Receiving water and treated effluent study. The Permittee is required to perform a receiving water study and to analyze treated stormwater following the electro-coagulation process. At least 20 samples will be collected and tested within the study timeframe of September 1, 2006, and April 30, 2007. At least one of the sample times shall coincide with the receiving water study.
3. Effluent mixing study to be completed by July 31, 2007.

The modified permit requires Pacific Fishermen to submit a receiving water study plan and upon approval to implement this plan which evaluates whether the treated effluent has a reasonable potential to cause a violation of the water quality standards. If reasonable potential exists, the Department will use this information to calculate effluent limits.

PUBLIC NOTICES

The proposed changes to this permit are considered to constitute a major modification under 40 CFR 122.62. Consequently, the draft permit modification is required to be published for a thirty (30)-day public review and comment period. This modification will be published in the *Seattle Times* and the *Seattle Post-Intelligencer*.

**Responsiveness Summary for Fact Sheet for
National Pollutant Discharge Elimination System (NPDES)
Permit No. WA-003104-6
Pacific Fishermen, Inc.**

Comments from Pacific Fishermen

Comment 1:

Section S11B, Treated Stormwater Effluent Analysis - This section requires you to analyze "treated wastewater discharge" for ten months coinciding with the receiving water study. This conflicts with Section S2B, number 5 that says you have until September 15, 2007 to complete the treatment system. RECOMMENDATION: Suggest that Ecology drop this section because you will be monitoring the treatment system anyway under the permit once it is in place. If they insist on keeping it, then delay it until after the treatment system is operating. Then it will not be a duplicate effort relative to your permit monitoring requirements. We will be test treating many samples in the implementation stage that will have reports that we will forward to you.

Response:

The required treated stormwater analysis is necessary to document that Pacific Fishermen can discharge treated storm water to surface water in compliance with state surface water quality standards. Additionally, the increased number of samples can be used to increase the numerical value of the state standard in the calculations. Pacific Fishermen still has until September 15, 2007, to complete their treatment system and meet surface water quality standards at the point of discharge.

Comment 2:

Section S11A, Receiving Water and Treated Effluent Study - This section has a sentence (third from the last) that states that the "sampling location should be outside the zone of influence of the effluent." We will not know the exact zone of influence until after modeling is complete. RECOMMENDATION: This should read "the sampling location should be in an appropriate location to obtain representative background receiving water quality."

Response:

The language has been modified to require Pacific Fishermen to ensure that the receiving water samples are representative of the background surface water and not influenced by the facility effluent.

Comment 3:

Section S12A, Effluent Mixing Study - Wording in the second paragraph precludes using mixing models unless "the diffuser is visually inspected for integrity or has been recently tested." RECOMMENDATION: There is no existing diffuser to inspect or test so the sentence should be deleted in its entirety and the model approached allowed outright.

Response:

The Department will allow Pacific Fishermen the option of using a diffuser. If this facility decides to utilize a diffuser in the future, visual inspection or recent testing is required.

Comment 4:

Section S12B, Effluent Mixing Study, Reporting Requirements - The third paragraph mentions toxicity tests and I have not found where they are suggested or required. RECOMMENDATION: This sentence should be modified to delete "toxicity tests."

Response:

The Department concurs. Toxicity tests are not required. Pacific Fishermen will meet the requirements of WAC-173-201A, surface water quality standards for the pollutants of concern.